

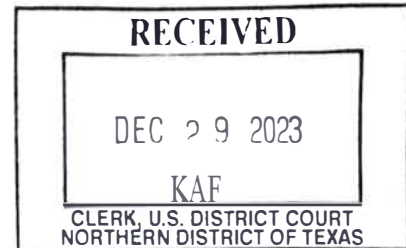


# TEMANI ADAMS PLLC

(469) 288-0888 PHONE (469) 277-3171 FAX

December 29, 2023

District Clerk  
United States District Court  
1100 Commerce Street, Room 1452  
Dallas, TX 75242



RE: 3:18-CR-232-K

To Whom It May Concern:

Please file the attached letter in the above case. A copy of the letter was delivered to Judge Kinkeade on today.

If you have any questions or require any additional information, please contact me at the telephone number or address provided.

Cordially,

Temani M. Adams

**Mailing Address**

3824 Cedar Springs Road, Suite 179  
Dallas, TX 75219

**Physical Address**

1111 W. Mockingbird Lane, Suite 790  
Dallas, TX 75247



# TEMANI ADAMS PLLC

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December 29, 2023

Judge Ed Kinkeade  
1100 Commerce Street, Room 1625  
Dallas, TX 75242

RE: 3:18-CR-232-K, Dkt. 439

Dear Judge Kinkeade:

On April 4, 2019, Rick Calvert, an Assistant United States Attorney filed Governments Ex Parte Motion to Unseal ("Motion") in the above case. In the Motion, Mr. Calvert made a false statement that I believe that he knew was false at the time. The evidence supports this assertion.

In the Motion, Mr. Calvert stated "the government was later advised by the United States Attorney's Office in the Eastern District of Texas that Ms. Adams is currently engaging in a pattern of potentially unethical conduct in that district." Mr. Calvert went on to state "Prosecutors in the United States Attorney's Office in the Eastern District of Texas have requested that the documents the government now seeks to unseal be provided to them."

These statements were false. At the time of the filing of said Motion, I had no pending cases in the Eastern District of Texas. In addition, I had no pending cases in any other district in Texas. When my attorney contacted Mr. Calvert to inquire about this statement, Mr. Calvert did not provide the name of the person at the United States Attorney's Office in the Eastern District of Texas who requested that the document be unsealed. Instead, Mr. Calvert stated that my attorney should contact the United States Attorney's Office in the Eastern District of Texas. My attorney did contact the United States Attorney's Office in the Eastern District of Texas. The United States Attorney's Office in the Eastern District of Texas had no idea what Mr. Calvert was referring to in the Motion, because as previously stated, I had no pending cases in the Eastern District of Texas. In fact, I hadn't had a case in Eastern District of Texas in the 2 years prior to Mr. Calvert making this statement. Further, I would not represent a client in the Eastern District of Texas until over a year after this statement was made. My case history in the Eastern District of Texas is publicly available via the Public Access To Court Electronic Records website, and was available at the time of Mr. Calvert's filing.

I believe that the false statements made in the Governments Ex Parte Motion to Unseal were made intentionally. I do not believe that the statement could have been the result of a mistake, as again, I had no pending cases in the Eastern District of Texas at that time of the filing and had not had any cases in the Eastern District of Texas for the 2 years prior to his filing.

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The document that Mr. Calvert sought to unseal, is still unsealed at the time of this letter. Neither I, or my attorney, have received any communications stating that the statement was a mistake, or any communications from the United States Attorney's Office in the Eastern District of Texas that support the statements made by Mr. Calvert, implicating the United States Attorney's Office in the Eastern District of Texas.

If you have any questions or require any additional information, please contact me at the address provided.

Cordially,

A handwritten signature in blue ink, consisting of a stylized 'T' followed by a horizontal line.

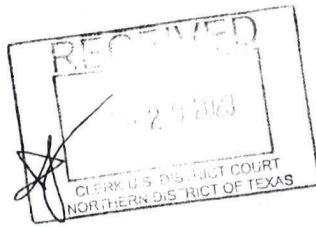
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Temani M. Adams

cc: Department of Justice: Washington, DC  
District Clerk Northern District of Texas

K

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